

1 BRIAN J. STRETCH (CABN 163973)  
United States Attorney

2 BARBARA J. VALLIERE (DCBN 439353)  
3 Chief, Criminal Division

4 KAREN KREUZKAMP (CABN 246151)  
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055  
6 San Francisco, California 94102-3495  
7 Telephone: (415) 436-7014  
8 FAX: (415) 436-7234  
Email: Karen.Kreuzkamp@usdoj.gov

Attorneys for United States of America

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 SAN FRANCISCO DIVISION  
12

13 UNITED STATES OF AMERICA, ) NO. CR 16-508 EMC  
14 Plaintiff, )  
15 v. )  
16 KRISHA VIRAMONTES, )  
17 Defendant. )

18  
19 UNITED STATES OF AMERICA, ) NO. CR 16-531 EMC  
20 Plaintiff, ) STIPULATED PROTECTIVE ORDER  
21 v. )  
22 CHRISTOPHER KINNEY, )  
23 Defendant. )

24  
25  
26  
27  
28 STIPULATED PROTECTIVE ORDER  
Case No. CR 16-508 EMC  
Case No. CR 16-531 EMC

1 **STIPULATED PROTECTIVE ORDER**

2 Pursuant to Federal Rule of Criminal Procedure 16(d) and 18 U.S.C. § 1835, the United States of  
3 America (“the government”), Defendant Krishna Viramontes, Defendant Christopher Kinney, and  
4 defense counsel, hereby stipulate to the following, and the Court therefore orders:

5 1. The government shall provide defense counsel a copy of materials received from  
6 Dropbox Inc., which materials may include suspected trade secrets and/or confidential and proprietary  
7 information (“the Materials”). Material provided according to this Protective Order will be labeled as  
8 “PROTECTED MATERIALS.”

9 2. Defense counsel and their staff (“the Defense”) and Defendants shall maintain the  
10 Materials, including any copies the Defense makes, as follows:

11 a. The Defense and Defendants shall use the Materials solely and exclusively in  
12 connection with this case (including investigation, trial preparation, trial, and appeal), and not for any  
13 commercial or other purpose.

14 b. Copies of the Materials shall be maintained by the Defense at their law offices in  
15 a locked room.

16 c. A copy of this protective order shall be kept with the copies of the Materials at all  
17 times.

18 d. The only people who may view the Materials are the Defense and Defendants.  
19 Defendants may access and view the Materials solely in the presence of counsel and under the direct  
20 supervision and control of counsel. Any notes Defendants may take regarding the Materials must be  
21 maintained by the Defense.

22 e. In no event shall the Defense or Defendants disclose or describe any of the  
23 Materials to any other person or entity other than the government, Dropbox, Inc., or this Court. Should  
24 the Defense or Defendants need to disclose or describe any of the Materials to this Court, it shall do so  
25 under seal. Should the Defense or Defendants need to disclose or describe any of the Materials to any  
26 other court or during any other legal proceedings, it shall do so only with notice to the government and  
27 after gaining permission from this Court.

3. Defense counsel shall promptly notify the government and this Court if any Materials are disclosed to anyone not designated by this Order or further order of the Court, either intentionally or unintentionally. Defendants shall promptly notify defense counsel of any such disclosures.

4. At the end of these proceedings, Defendants and the Defense shall return the Materials and any copies to the government. Defense counsel may retain or destroy any notes made by Defendants or the Defense.

IT IS SO STIPULATED.

DATED: August 21, 2017

BRIAN J. STRETCH  
United States Attorney

/s/  
KAREN KREUZKAMP  
Assistant United States Attorney

DATED: August 21, 2017

/s/  


---

**GEOFFREY HANSEN**  
 Counsel for Defendant  
 Krisha Viramontes

DATED: August 21, 2017

/s/  
 \_\_\_\_\_  
 GAIL SHIFMAN  
 Counsel for Defendant  
 Christopher Kinney

IT IS SO ORDERED.

DATED: August 22, 2017

HON. EDWARD  
United States Dis

STIPULATED PROTECTIVE ORDER  
Case No. CR 16-508 EMC  
Case No. CR 16-531 EMC

